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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the

John Ward	Limited Partner	5.41%
Aaron O. Wells	Limited Partner	<u>5.41%</u>
		100.00%

Regarding integration of ownership in management, James H. Dowdy will be the full-time General Manager of the station, working in that capacity a minimum of forty hours per week. His responsibilities will be as follows:

Chief executive officer, approves all policy decision, budgets, personnel practices, format revisions. Sets compensation levels and approves hiring and firing of department heads. Handles any union negotiations. Approves capital expenditures, negotiates leases. Supervises business manager and operations manager.

M. Steven C. Williams will be the full-time Business Manager of the station, working in that capacity a minimum of forty hours per week. His responsibilities will be as follows:

Supervises the station's sales and accounting functions, serves as chief financial officer. Responsible for billing and collection of receivables, maintaining bank accounts and payment of accounts receivable. Sets sales department quotas in consultation with sales manager, hires and fires sales personnel. In charge of clerical and accounting personnel. Reports to the general manager.

Messrs. Dowdy and Williams will withdraw fully from any present or future employment each may have in order to fulfill his commitment to work full-time in the station. Enhancement credit will be claimed for both Mr. Dowdy and Mr. Williams on the basis of minority (Black) status, civic activities and local residence within the city of license and the applicant's proposed City Grade contour.

The only cognizable media interest is Mr. Dowdy's 49% ownership interest in the New York Voice, a weekly newspaper in New

York, N.Y. Mr. Dowdy has made in the Class application a timely divestiture statement in that in the event of grant of the Class application, he will divest himself of all ownership interest and sever all relationship with the New York Voice newspaper.

While such interests are not cognizable, the following is included re certain limited partners in Class as follows:

Clarence O. Smith has a less than five percent (5%) ownership interest in Queen City III Limited Partnership, which owns 98% of the stock in Queen City Broadcasting, Inc., which in turn is the sole stockholder in Queen City Broadcasting of New York, Inc., licensee of television station WKBW, Buffalo, New York. Edward Lewis also owns and controls less than five percent (5%) ownership interest in Queen City III Limited Partnership. According to information on file at the Commission in the WKBW ownership report file, the ownership interests of Messrs. Smith and Lewis are designated as General Partnership units, but the partnership is governed by a Management Committee of eleven persons. Mr. Smith is not on the Management Committee. Mr. Lewis is on the Management Committee and is on the Board of Directors of Queen City Broadcasting, Inc. and Queen City Broadcasting of New York, Inc.

Respectfully submitted,

**CLASS ENTERTAINMENT AND
COMMUNICATIONS, L.P.**

By


M. Steven Williams
General Partner

Date: April 14, 1993

CERTIFICATE OF SERVICE

I, Linda Gibson, do hereby certify that on the 16th day of April 1993, a copy of the foregoing "Submission of Integration/Diversification Statement of Class Entertainment and Communications, L.P." was sent first-class mail, postage prepaid to the following:

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Linda Gibson

* Hand-Delivered